

1 HONORABLE TIFFANY M. CARTWRIGHT  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

9 JUSTIN FRANKS,

10 Plaintiff,

11 v.

12 THE NIELSEN COMPANY (US), LLC;  
GRACENOTE, INC.; JOHN DOES 1-10,

13 Defendants.

14 No. 3:23-cv-06150-TMC

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**STIPULATED MOTION TO EXTEND  
DEADLINE FOR JOINT STATUS  
REPORT AND RULE 26 INITIAL  
DISCLOSURES**

The parties to this action, by and through their undersigned counsel, respectfully submit this joint motion as follows:

1. On March 8, 2024, Plaintiff filed his First Amended Complaint. ECF No. 15.
2. On April 2, 2024, Plaintiff filed his Second Amended Complaint to add Title VII claims after exhausting administrative remedies. ECF No. 21.
3. On May 3, 2024, Defendants filed a Motion to Compel Arbitration, or In the Alternative, to Dismiss. ECF No. 24.

1       4. Plaintiff and Defendants respectfully request that this Court reset the due date  
2 for the parties' Joint Status Report and Rule 26 Initial Disclosures until after the Court has  
3 resolved the pending Motion to Compel Arbitration.

4       5. If Defendants' Motion to Compel Arbitration is granted, then there may be no  
5 need for these filings.

6       6. If Defendants' Motion to Compel Arbitration is denied, the parties respectfully  
7 request that the Court grant them 21 days after the relevant order is entered to file their Joint  
8 Status Report and exchange Rule 26 Initial Disclosures.

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10     Respectfully submitted this 16th day of May 2024:

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*Attorneys for Defendants*

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2                   **ORDER**  
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4                   THIS MATTER having come before the Court on the agreed motion of the parties, the  
5                   Court hereby orders that the parties' deadline to file a Joint Status Report and exchange Rule  
6                   26 Initial Disclosures is reset to 21 days after the Court rules on Defendants' Motion to  
7                   Compel Arbitration, or in the Alternative, to Dismiss. Defendants and Plaintiff met and  
8                   conferred and jointly agree to this motion.

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10                  IT IS SO ORDERED.  
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12                  DATED this 17th day of May, 2024.  
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16                  TIFFANY M. CARTWRIGHT  
17                  United States District Judge

18                  Presented by:  
19

20                  CORR CRONIN LLP  
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22                  *s/ Blake Marks-Dias*  
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25                  to Extend Deadline  
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